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UNITED STATES BANKRUPTCY COURT

SOUTHERNDISTRICT OF NEW YORK
Chapter 11

In re:

SOUNDVIEW ELITE LTD., et al

Debtors.

ALPHONSE FLETCHER, JR.,(Pro Se)

Appellants,

v.

CORINNE BALL, TRUSTEE.

Appellees.

Case No. 13-13098 (REG)
(Jointly Administered)

**ON APPEAL BY ALPHONSE FLETCHER, JR.,
TO THE UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK**

**DESIGNATION OF THE ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL
AND A STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL FROM THE
BANKRUPTCY COURT'S AUGUST 7, 2014 ORDER DENYING THE MOTION TO
REMOVE CHAPTER 11 TRUSTEE, DISMISS THIS ACTION, AND OTHER AND
FURTHER RELIEF**

In accordance with the requirements of Federal Rule of Bankruptcy Procedure 8006, Alphonse Fletcher, Jr., *Pro Se* respectfully submits the following statement of issues to be presented, and designation of record items to be included, in the record on appeal in connection with the Notice of Appeal filed on the 21st day of August, 2014.¹ The Notice of Appeal was filed to appeal the

¹ I respectfully request that the Court accept these statements in spite of any procedural missteps including timing, structure, language, or other formalities. I humbly request that any parties aware of such shortcomings immediately inform me of such in the interests of protecting the integrity of the system.

Bankruptcy Court's August 7, 2014 'Order Denying the Motion to Remove Chapter 11 Trustee,
Dismiss this Action, and Other and Further Relief' [Docket 306].

STATEMENT OF ISSUES ON APPEAL

Whether the Bankruptcy Court committed an error of law or an abuse of discretion or exceeded its discretion, under Bankruptcy Codes and Rules including Code 327 and Rule 2014, in not disqualifying and removing a chapter 11 trustee (“Trustee”), her counsel (“Trustee’s Counsel”) and her financial advisor (“Financial Advisor,” the three together, “Fiduciaries”) serving jointly administered debtors (“Debtors”) after being put on notice that those Fiduciaries currently represent and previously represented

1. parties-in-interest in those proceedings including various parties actually or potentially adverse to the Debtors, or affiliates of such parties.
2. parties affiliated with defendants (“Civil Rights Defendants”) in civil rights litigation brought by affiliates of the Debtors in circumstances in which the Civil Rights Defendants unlawfully retaliated by promising to and taking actions intended to “destroy” the plaintiffs and the plaintiff’s affiliated funds, including the Debtors, according to the civil rights lawsuit’s complaint.

DESIGNATION OF RECORD ITEMS FOR APPEAL

The Appellant submits the following items, together with all exhibits, schedules and other attachments thereto (including but not limited to, the exhibits, schedules and other attachments specifically designated below), for inclusion in the record of the Appeal:

**Soundview Elite Ltd., et al.
U.S. Bankruptcy Court
Southern District of New York
Chapter 11 Case No.: 13-13098 (REG)**

Item No.	Docket No.	Date	Description
	12	9/30/2013	Motion for Sanctions for Violation of Automatic Stay Motion for an Order Imposing Sanctions Against Citco Global Custody (N.A.) N.V., Deborah Hicks Midanek,
	45	10/24/2013	Transcript regarding Hearing Held on October 16, 2013 at 10:03 AM RE: Motion for Sanctions for Violation of Automatic Stay Motion for an Order Imposing Sanctions Against Citco Global Custody (N.A.) N.V., Deborah Hicks Midanek,....
	118	12/11/2013	Affidavit Corrected: Direct Testimony Affidavit of Alphonse Fletcher, Jr. on Motions to Dismiss, Convert, or Appoint a Trustee
	119	12/11/2013	Affidavit Supplemental Direct Testimony Affidavit of Alphonse Fletcher, Jr. on Motions to Dismiss, Convert or Appoint a Trustee
	124	12/11/2013	Affidavit of Rebuttal Testimony of Richard T.W. Annette in Connection With the Trial Proceedings on December 17-18, 2013
	133	12/16/2013	Affidavit Second Rebuttal Testimony Certification of Richard J. Annette
	137	12/20/2013	Transcript regarding Hearing Held on December 13, 2013
	138	12/19/2013	Transcript regarding Hearing Held on December 17, 2013
	139	12/20/2013	Transcript regarding Hearing Held on December 18, 2013
	140	12/20/2013	Transcript regarding Hearing Held on December 19, 2013

Item No.	Docket No.	Date	Description
	141	12/23/2013	Transcript regarding Hearing Held on December 20, 2013
	145	1/8/2014	Transcript regarding Hearing Held on January 7, 2014
	151	1/21/2014	Letter in Response to the Joint Official Liquidators' Emergency Motion for Temporary Restraining Order
	152	1/21/2014	Letter Debtors Statement Regarding Exhibit K to Disclosure Statement in In Re: Fletcher International, Ltd., Case No. 12-12796
	157	1/22/2014	Transcript regarding Hearing Held on January 21, 2014 RE: Emergency Motion Filed by the Joint Official Liquidators for Temporary Restraining Order
	156	1/23/2014	Bench Decision Signed on 1/23/2014 on Motions to Dismiss, for Relief from Stay, for Appointment of Trustee, and on Sanctions for Contempt
	161	1/31/2014	Appointment of Chapter 11 Trustee /Application for Order Approving Appointment of Chapter 11 Trustee
	176	2/13/2014	Application to Employ Jones Day as Counsel to Chapter 11 Trustee
	205	3/05/2014	Application to Employ Kinetic Partners US LLP as Financial Consultant
	212	3/10/2014	Statement / First Supplemental Disclosure of Jones Day with Respect to Application of the Trustee for an Order Authorizing the Trustee to Retain Jones Day
	213	3/10/2014	Declaration / First Supplemental Declaration of Corinne Ball
	240	3/13/2014	Transcript regarding Hearing Held on March 12, 2014
	242	3/20/2014	Transcript regarding Hearing Held on March 19, 2014
	246	4/1/2014	Adversary case 14-01923. Complaint against Soundview Composite Ltd. for Turnover and an Accounting of Estate Property ...
	291	7/03/2014	Motion to Remove Trustee , Dismiss this Action and Other and Further Relief filed by Gerti Muho
	302	7/30/2014	Statement Joinder in Part in the Chapter 11 Trustee's Objection to the Motion to Remove Chapter 11 Trustee, Dismiss this Action, and Other and Further Relief filed by Alphonse Fletcher Jr
	305	8/04/2014	Response to Trustee's Objection to the Motion To Remove Chapter 11 Trustee, Dismiss This Action, And Other And Further Relief filed by Gerti Muho.
	307	8/07/2014	Transcript regarding Hearing Held on August 6, 2014
	306	8/07/2014	Order Signed on 8/7/2014 Denying the Motion of Gerti Muho to Remove the Chapter 11 Trustee, Dismiss this Action, and Other and Further Relief.

Fletcher International, Ltd.²
U.S. Bankruptcy Court
Southern District of New York
Chapter 11 Case No.: 12-12796 (REG)

Item No.	Docket No.	Date	Description
	481	03/21/2014	Motion to Compel /Motion of Alphonse Fletcher, Jr. to Compel Compliance with Bankruptcy Code and Rules in re Fletcher International, Ltd and Associated Cases filed by Alphonse Fletcher Jr.
	493	04/01/2004	Table of Fiduciary Connections

Dated: September 3, 2014
San Francisco, CA



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² Fletcher International, Ltd. is an associated case that is also pending before Judge Gerber. The Appellant has designated items from this docket because they were cited in Statement Joinder in Part in the Chapter 11 Trustee's Objection to the Motion to Remove Chapter 11 Trustee, Dismiss this Action, and Other and Further Relief [Docket 302]